

EXHIBIT C

Provance, Matthew D.

From: Nemelka, Michael N. <mnemelka@kelloggghansen.com>
Sent: Tuesday, November 20, 2018 1:03 PM
To: Provance, Matthew D.
Cc: SERVICE-EXTERNAL-DMS-MDL; Guarnera, Daniel S.
Subject: Re: Second Set of RFPs to CDK from the Individual and Vendor Class Plaintiffs

****EXTERNAL SENDER****

Matt,

Thanks for letting us know. As I stated on the call yesterday, we wished CDK would have met and conferred with us as to the substance of the requests instead of refusing to do so. As I made clear, we were willing to consider narrowing the requests to find a compromise position if CDK would have been willing to engage. But CDK has refused to do anything but serve their blanket objections.

Thanks,
Mike

On Nov 20, 2018, at 1:50 PM, Provance, Matthew D. <MProvance@mayerbrown.com> wrote:

Mike –

Thank you for the meet-and-confer yesterday. We understand that Plaintiffs are not withdrawing their requests. Therefore, the parties are at impasse and CDK will be moving for a protective order.

Thanks,
Matt

Matt Provance
Mayer Brown LLP
mprovance@mayerbrown.com
Tel: 312 701 8598
Fax: 312 706 9397

From: Nemelka, Michael N. <mnemelka@kelloggghansen.com>
Sent: Wednesday, November 14, 2018 8:23 AM
To: Provance, Matthew D. <MProvance@mayerbrown.com>; SERVICE-EXTERNAL-DMS-MDL <SERVICE-EXTERNAL-DMS-MDL@lists.kelloggghansen.com>
Cc: Guarnera, Daniel S. <dguarnera@kelloggghansen.com>
Subject: RE: Second Set of RFPs to CDK from the Individual and Vendor Class Plaintiffs

****EXTERNAL SENDER****

Matt,

It appears that CDK is refusing to produce documents in response to each of these RFPs. Can we please have a meet and confer regarding CDK's refusal? I am available tomorrow after 2:00 p.m. ET, or Friday between 10:00 a.m. and 3:00 p.m. ET.

Thanks,
Mike

From: Provance, Matthew D. [<mailto:MProvance@mayerbrown.com>]
Sent: Tuesday, November 13, 2018 11:37 PM
To: SERVICE-EXTERNAL-DMS-MDL <SERVICE-EXTERNAL-DMS-MDL@lists.kelloggghansen.com>
Cc: Guarnera, Daniel S. <dguarnera@kelloggghansen.com>
Subject: RE: Second Set of RFPs to CDK from the Individual and Vendor Class Plaintiffs

Counsel, please see the attached responses.

Thanks,
Matt Provance

Matt Provance
Mayer Brown LLP
mprovance@mayerbrown.com
Tel: 312 701 8598
Fax: 312 706 9397

From: Guarnera, Daniel S. <dguarnera@kelloggghansen.com>
Sent: Friday, October 12, 2018 8:18 PM
To: SERVICE-EXTERNAL-DMS-MDL <SERVICE-EXTERNAL-DMS-MDL@lists.kelloggghansen.com>
Subject: Second Set of RFPs to CDK from the Individual and Vendor Class Plaintiffs

Britt and Matt,

Please find attached the Individual and Vendor Class Plaintiffs' Second Set of Requests for the Production of Documents to CDK.

All the best,
Dan

Daniel S. Guarnera
Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C.
1615 M Street, N.W. | Suite 400 | Washington, DC 20036
Tel: 202-326-7923 | Fax: 202-326-7999

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